UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, et al. Plaintiffs. v. AMERICAN FOAM CORPORATION, et al. Defendants.	)))))))))	 C.A. No. 03-335-L (Adopting 04-312-L)

DEFENDANTS'[1] ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFFS' NOTICE OF ADOPTION OF THE THIRD AMENDED MASTER COMPLAINT

NOW COME defendants Knight-Celotex Lisbon Falls LLC, Knight Celotex LLC, Knight Industries Inc., Knight Industries, LLC and Knight Industries I, LLC (collectively, "Knight") and for their answer and affirmative defenses to the Plaintiffs' Notice of Adoption of the Third Amended Master Complaint filed in George Guindon, et al. v. American Foam Corporation, et al., C.A. No. 03-335L (Guindon Doc. # 244) state as follows:

Plaintiffs have adopted the Third Amended Master Complaint filed in Albert L. Gray, Administrator, et al. v. Jeffrey Derderian, et al., C.A. No. 04-312-L (the "Gray Case"). In response to Plaintiffs' Notice of Adoption of the Third Amended Master Complaint, Knight adopts and incorporates herein Knight's Answer and Affirmative Defenses to the Third Amended Master Complaint filed in the Gray Case. See Gray Doc. # 865.

WHEREFORE, Defendants Knight-Celotex Lisbon Falls LLC, Knight-Celotex LLC, Knight Industries, Inc., Knight Industries, LLC and Knight Industries I, LLC pray that:

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[1] Defendants are Knight-Celotex Lisbon Falls, LLC, Knight-Celotex LLC, Knight Industries, Inc., Knight Industries, LLC and Knight Industries I, LLC. Plaintiffs are those named in the Notice of Adoption of Third Amended Master Complaint filed in George Guindon, et al. v. American Foam Corporation, et al., C.A. No. 03-335L (Guindon Doc. # 244).

(a) the Third Amended Master Complaint and Plaintiffs' Notice of Adoption of the Third Amended Master Complaint be dismissed with prejudice as to Knight-Celotex Lisbon Falls LLC, Knight-Celotex LLC, Knight Industries, Inc., Knight Industries, LLC and Knight Industries I, LLC;

(b) Plaintiffs' demand for relief against Knight-Celotex Lisbon Falls LLC, Knight-Celotex LLC, Knight Industries, Inc., Knight Industries, LLC and Knight Industries I, LLC be denied in every respect;

(c) Knight-Celotex Lisbon Falls LLC, Knight-Celotex LLC, Knight Industries, Inc., Knight Industries, LLC and Knight Industries I, LLC be awarded costs in connection with this litigation, including reasonable attorneys' fees; and

(d) the Court grant such other and further relief as maybe just, proper, and equitable.

Dated: September 5, 2006

Respectfully submitted,

DEFENDANTS[2]

By: /s/ David E. Maglio, Esq.

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- and -

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[2] See n.1, supra.

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CERTIFICATION

To:

I hereby that an exact copy of the within document was filed by CM/ECF to the following individuals on the 5th day of September, 2006.

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And the following attorneys have been sent a true copy of the above document by conventional e-mail:

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/s/ David E. Maglio, Esq.

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